

ALLEN & OVERY

Hon. Victoria Reznik
United States Magistrate Judge
Southern District of New York
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White Plains, NY 10601

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March 7, 2024

**RE: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*,
Case No. 7-13-cv-09239-CS-VR**

Dear Judge Reznik:

We represent Defendant Qatar Airways Group Q.C.S.C. (“Qatar Airways”).

This letter is written in accordance with the Court’s Order of March 1, 2024 which requires the Defendants to provide insurance information or objections to the production of insurance information by March 7, 2024.

Qatar Airways respectfully objects to any Order that requires it to disclose the existence and extent of its insurance coverage to the extent the Order does not expressly provide that Qatar Airways preserves any objection it may have to personal jurisdiction that it may later assert in its response to the operative Complaint. Qatar Airways also respectfully asks that Plaintiff be required to enter into a Stipulated Protective Order so that the confidentiality of any insurance information produced, subject to Qatar Airways’ personal jurisdiction reservation, can be protected.

We have been recently appointed as counsel on this matter and are working diligently with Qatar Airways to gather the requested information. However, we require additional time to investigate the existence and extent of insurance coverage, if any.

Respectfully,

/s/ Sapna Palla
Sapna Palla

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